

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
V.	§	CRIMINAL NO. 4:17-CR-162
	§	
AGRONGKRON MALASUKUM	§	

MOTION FOR PRELIMINARY ORDER OF FORFEITURE

The United States of America, by its undersigned counsel, respectfully submits its Motion for Preliminary Order of Forfeiture in the above-entitled case, and in support thereof would show the following:

1. On October 10, 2017, a one-count information was filed against the defendant, **Arongkron Malasukum**, charging the defendant with a violation of 16 U.S.C. § 3372(a)(1) and 3373(d)(1)(B).
2. On November 11, 2017, the defendant entered a plea of guilty to Count One of the information, which charged a violation of 16 U.S.C. § 3372(a)(1), Lacey Act wildlife trafficking. Pursuant to the terms of the plea agreement, the defendant agreed to forfeit the property described below and waived the right to notice of any forfeiture proceeding involving the above described property.
3. The government seeks forfeiture of the following property pursuant to 16 U.S.C. § 3374, 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461(c):
 - (1) [Evidence envelope] (A-1) one pendant necklace
 - (2) (A-2) one pendant
 - (3) (A-3) two claws
 - (4) (A-4) two statues

- (5) (A-5) one small screw top vessel
- (6) (A-6) one pendant
- (7) (A-7) one statue
- (8) (A-8) one necklace
- (9) (A-9) one statue
- (10) (A-10) one pendant
- (11) (A-11) two bracelets
- (12) (A-13) one lion skull
- (13) (A-14) twenty one claws
- (14) (A-15) nine carved wildlife items
- (15) (A-16) twenty four wildlife items, carved and raw
- (16) (A-17) one shipping box with twenty five wildlife items
- (17) (A-18) five claws
- (18) (A-19) one skeletal paw with claws
- (19) (A-20) one box with three wildlife items
- (20) (A-21) one tin box with eight wildlife items
- (21) (A-22) one screw top box with eight wildlife items
- (22) (A-23) four claws
- (23) (A-24) two pieces of wildlife antler product
- (24) (A-25) one set of 3 wood chisels
- (25) (A-33) one skull
- (26) (A-34) one box with three bracelets and assorted teeth, claws, beads, and bone pieces
- (27) (A-39) one tusk
- (28) (A-40) one tusk
- (29) (A-41) one skull
- (30) (A-48) one keychain with four teeth

4. Upon the issuance of a Preliminary Order of Forfeiture, the United States will provide written notice to all third parties asserting a legal interest in any of the above-described property to be forfeited by publishing notice of the Court's Order and the United States' intent to dispose of the property to be forfeited at www.forfeiture.gov for 30 consecutive days, pursuant to 21 U.S.C. § 853(n)(1), Supplemental Rule G(4)(a)(vi)(C), and the Attorney General's authority to determine the manner of publication of an Order of forfeiture in a criminal case.

Accordingly, the United States respectfully requests that this Court enter judgment of criminal forfeiture by issuing the proposed preliminary order of forfeiture and forfeiting to the United States of America the interest of the above named defendant in the aforementioned property.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that the Motion for Issuance of a Preliminary Order of Forfeiture has been served on counsel of record for defendant via the Court's CM/ECF filing system on August 13, 2018.

/s/ Jim Noble
JIM NOBLE

CERTIFICATE OF CONFERENCE

I have conferred with counsel of record for defendant regarding the merits of this motion. The motion is UNOPPOSED.

/s/ Jim Noble
JIM NOBLE